

Pennsylvania Farmland Preservation Association



This comment is in relation to Secretary Johanns's Question #4
(How can farm policy best achieve conservation and environmental goals?)

I would suggest that when selecting conservation easements to fund, added weight be given to those easements that incorporate 100 year FEMA Floodplains, particularly those easements that contain a significant amount of undeveloped flood plain area. The benefits to farmland preservation, the environment and avoidance of future remediation costs of developed flood plains is obvious.

1. Nearly all counties have floodplains, particularly in Pennsylvania.
2. Development of floodplains lead to further stormwater problems and remediation costs downstream.
3. The vast majority of wetlands are located in the floodplain.
3. By definition, many of our Riparian areas, and the flora and fauna within are located in floodplains.
5. Remediation costs to buy out future development in the floodplain will be prohibitive.
6. A significant amount of prime farmland soil is located in floodplains.
7. By directing perpetual conservation easements to farmland that includes flood plains, the question of a constitutional taking is put to rest which is not the case if floodplain development is prohibited by local ordinances.
8. Conservation Easements purchased on floodplain lands would be a bargain for taxpayers dollars (depressed appraisal values), fulfill multiple Federal, State and local government goals, insure future floodplain insurance costs and insurance claims would be less likely to increase and in addition, **preserve our farmland**.

Please rely on our Association and its county members whenever you want assistance.

Sincerely,

Frank J. Burggraf
President
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